

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:)	
)	
ASHLEY MARIE GJOVIK,)	CHAPTER 7
)	CASE NO. 25-11496-CJP
Debtor)	

**CHAPTER 7 TRUSTEE’S RESPONSE
TO DEBTOR’S MOTION TO COMPEL**

Mark G. DeGiacomo, the duly-appointed Chapter 7 Trustee for the above-captioned bankruptcy estate (the “Trustee”) hereby submits his Response to the Debtor’s Motion to Compel.

1. On July 21, 2025, Ashley Marie Gjovik (the “Debtor”) filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code (the “Petition Date”).

2. On July 22, 2025, the Trustee was appointed as the Chapter 7 Trustee of this bankruptcy estate.

3. On August 28, 2025, the Debtor filed her Motion for a Protective Order and to Compel Trustee Action [Doc. No. 19]. On or about September 11, 2025, the Debtor filed a supplement to this motion (together these two documents are referred to as the “Motion to Compel”).

4. The Debtor is not entitled to any of the relief requested in the Motion to Compel. The Motion to Compel should be denied for reasons too obvious to expound upon here.

5. The first session of the Section 341 meeting was conducted as scheduled on August 21, 2025.

6. The Trustee is in the process of reviewing the significant amount of actual or potential causes of action the Debtor asserts she held on the Petition Date against dozens of entities and individuals.

7. The Trustee is hoping to make decisions concerning whether he will abandon or prosecute most of the claims by or around September 30, 2025.

WHEREFORE, the Trustee requests that this Court enter an Order denying the Motion to Compel.

MARK G. DEGIACOMO, CHAPTER 7
TRUSTEE OF THE ESTATE OF ASHLEY
MARIE GJOVIK,

/s/ Mark G. DeGiacomo

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Dated: September 11, 2025

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CERTIFICATE OF SERVICE

I, Mark G. DeGiacomo, hereby certify that on the 11th day of September, 2025, I served a copy of the ***Chapter 7 Trustee's Response to Debtor's Motion to Compel*** via first-class mail, postage prepaid, ECF Transmission or by electronic mail upon the parties listed on the attached Service List.

/s/ Mark G. DeGiacomo

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Aidvantage- U.S. Department of
Education
Attention: Bankruptcy Discharge
P.O. Box 9635
Wilkes-Barre, PA 18773

Apple Inc
Attention; Apple Payment Services
10355 N. De Anza Blvd
Cupertino, CA 95014

Bank of America
Attention; Billing/Insolvency
PO Box 672050
Dallas, TX 75267

Boston Medical
Attention: Billing/Insolvency
One Boston Medical Center Place
Boston, MA 02118

Goldman Sachs Bank USA
Salt Lake City Branch
Lockbox 6112, P.O. Box 7247
Philadelphia, PA 19170

JPMorgan Chase Bank, N.A.
Mail Code LA4-7100
Monroe, LA 71203

U.S. Department of Education
Attention: Bankruptcy Discharge
400 Maryland Avenue, SW
Washington, DC 20202

Aidvantage on behalf of The
Department of Education
PO Box 300001
Greenville, TX 75403

Tremont Dental Care
Attention: Billing/Insolvency
635 Tremont St.
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*served via ECF transmission